

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(1) Terrell Marshall ND 6745
 (Name of Plaintiff) (Inmate Number)
SCI Frackville 17932
301 Moreau Road, Frackville, PA
 (Address)

(2) _____
 (Name of Plaintiff) (Inmate Number) _____ (Case Number)

(Address)

(Each named party must be numbered,
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

(1) Nelson Anthony Iannuzzi

(2) Huresh Pandya

(3) _____
 (Names of Defendants)

(Each named party must be numbered,
and all names must be printed or typed)

FILED
HARRISBURG, PA

MAR 26 2020
 PER _____
 PER _____
 DEPUTY CLERK
 DEPUTY CLERK

TO BE FILED UNDER: ✓ 42 U.S.C. § 1983 – STATE OFFICIALS

_____ 28 U.S.C. § 1331 – FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case Number including year, as well as the name of the judicial officer to whom it was assigned:

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

A. Is there a prisoner grievance procedure available at your present institution? Yes _____ No _____

B. Have you fully exhausted your available administrative remedies regarding each of your present Claims? Yes _____ No _____

C. If your answer to "B" is Yes:

1. What steps did you take? I sent a grievance I got a response I appeal to the facility manager, I got a response, I appeal to Central office I got a response

2. What was the result? In one response they Admited to misdiagnosis of my injury. But say it's no wrong doing Done.

D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS

(1) Name of first defendant: Nelson Anthony Tannucci
 Employed as Certified register nurse at SCI Frackville
 Mailing address: 1111 ALTMONT BLVD, Frackville, PA, 17931

(2) Name of second defendant: Hursh Pandya
 Employed as Dr. Pandya at SCI Frackville
 Mailing address: 1111 ALTMONT BLVD Frackville, PA, 17931

(3) Name of third defendant: _____
 Employed as _____ at _____
 Mailing address: _____
 (List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. ON April 1st 2018 I suffered a basketball injury
To my left lower leg in SCI Frackville yard.
after that I experience misdiagnosis and negligence

For 6 days straight which I wrote a grievance for every event that occurs with Nelson Iannuzzi denying me outside access to a hospital to be properly diagnosed

2. Because of the complaints And being seen by a RN that Seen my Leg I was sent to a hospital on the 7th day.

5 days go pass And I experienced the same thing with Nelson Iannuzzi with my injury as it gets worse I write more grievances. On April 12th I was sent to Pottsville hospital and was diagnosed that my injury got worse. Dr. Huresh Papaya neglected to send me to an infirmary and sent me back to Frackville. Know my injury got seriously worse later that night I was rushed to Geisinger ER for ~~bleeding~~ bleeding internal at the date I was diagnose to have compartment syndrome which lead to 3 surgeries permanent muscle loss, permanent nerve damage

A. long incision with staples and stitcher = see Full Story Attachment

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I requesting 1,000,000 dollars for medical mal-practice misdiagnosis and negligence, pain and suffering, mental stress. And for future medical needs for the rest of my life dealing with my Leg injury
2. I'm requesting to be medically z-coded to a single bed cell while I'm incarcerated with no cell mate due to my disability to my leg for safety and fear for re-injury. Permanent bottom tier status permanent bottom bunk status
3. I'm requesting to be moved to another SCI jail with in the same travel range for my family from Philadelphia for the main reason of retaliation of SCI Frackville. I'm requesting SCI Chester or SCI Phoenix to be transferred to for fear of retaliation and it's still close for my family to visit.

I declare under penalty of perjury that the forgoing is true and correct.

Signed this _____ day of _____, 20 ____.

Tersell M. Marshall
(Signature of Plaintiff)